Shiloh Hernandez Western Environmental Law Center 103 Reeder's Alley Helena, Montana 59601 (406) 204-4861 hernandez@westernlaw.org Erik Schlenker-Goodrich Western Environmental Law Center 208 Paseo del Pueblo Sur, #602 Taos, New Mexico 87571 (575) 613-4197 eriksg@westernlaw.org

Sarah McMillan WildEarth Guardians P.O. Box 7516 Missoula, Montana 59807 (406) 459-3895 smcmillan@wildearthguardians.org

Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

MONTANA ENVIRONMENTAL)
INFORMATION CENTER, et al.,) No. 4:11-CV-15-GF-SEH
)
Plaintiffs,) STATUS REPORT
)
V.)
)
UNITED STATES BUREAU OF)
LAND MANAGEMENT, et al.)
)
Federal Defendants,)
)
V.)
)
AMERICAN PETROLEUM)
INSTITUTE, et al.)
)
Intervenor Defendants.)
)

In response to this Court's Order of March 21, 2016, Plaintiffs Montana Environmental Information Center et al. and Federal Defendants U.S. Bureau of Land Management et al. provide this Status Report to the Court.

Plaintiffs and Federal Defendants have engaged in productive settlement discussions and have agreed to a settlement in principle. Plaintiffs and Federal Defendants have drafted a settlement embodying their agreement and are awaiting final approval by all parties and decision-makers of the final document.

Plaintiffs and Federal Defendants will file the settlement agreement and appropriate request to dismiss this action as soon as the final settlement document has been approved by all parties and decision-makers.

Respectfully submitted this 15th day of April 2016.

/s/ Shiloh Hernandez
Shiloh Hernandez
Western Environmental Law Center
103 Reeder's Alley
Helena, Montana 59601
(406) 204-4861
hernandez@westernlaw.org

Attorney for Plaintiffs

/s/ Ruth Ann Storey
Ruth Ann Storey
Trial Attorney
U.S. Department of Justice
Environment & Natural Resources Division
Natural Resources Section
Ben Franklin Station, P.O. Box 663
Washington, D.C. 20044-0663

Attorney for Federal Defendants

CERTIFICATE OF SERVICE

I, the undersigned counsel of record, hereby certify that on this 15th day of April, 2016, I filed a copy of this document electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/ Shiloh Hernandez Shiloh Hernandez